

MR. BOONE: Let me make that --

20 I don't know how many more
21 insurance questions, but
22 that's clearly irrelevant
23 and not pertinent to a

0078

1 death case in Alabama which
2 is purely punitive. But
3 I'll allow the questions to
4 continue, but it's not
5 discoverable evidence in
6 this case but definitely
7 not admissible evidence in
8 this case. But I'll let
9 her go ahead and answer.

10 MR. BROCKWELL: And -- and

11 whether this is admissible
12 at trial or not is a
13 separate issue, obviously.
14 But what we've told you in
15 a letter, LaBarron, was
16 that, you know, we think
17 any insurance payments are
18 relevant at least at this
19 stage for us to know if
20 there's any potential
21 offsets or credits, any
22 sort of subrogation claims
23 out there, claims for

0079

1 reimbursement. And that's
2 the reasons I'm asking
3 these questions, to make
4 sure it's not a possible
5 insurance company down the
6 road to ask my client to
7 pay them back for whatever
8 they've paid you. And
9 that's why I need to know
10 about these items.

11 Q. So you say you've received life
12 insurance and that you believe you have
13 some documents you could give your
14 attorney on those payments; is that
15 correct?

16 A. Right. And I received a

17 check from Benton Express.

18 Q. And you understand that's my
19 client, ma'am, Benton Express?

20 A. Right.

21 Q. When did you receive that?

22 MR. BOONE: I'm going to object
23 to the form. Irrelevance

0080

1 of these questions, too,
2 but you can answer. I
3 think y'all -- I know y'all
4 sent it to her.

5 A. I guess within -- within two
6 months ago, I believe.

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